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**REMARKS**

Claims 1-20 are pending. Claims 6, 12, 18-20 were rejected under 35 USC 112, second paragraph; claims 1, 2, 6-8, 12-14, 18 and 20 were rejected under 35 USC 102(b) over Kim, US 5,881,175; claims 3, 9 and 15 were rejected under 35 USC 103(a) over Kim in further view of Itokawa, US 6,404,901; claims 4, 5, 10, 11, 16 and 17 were rejected under 35 USC 103(a) over Kim in further view of Ostermann ("Coding of Arbitrary Shaped Objects ..."); and claim 19 was rejected under 35 USC 103(a) over Kim in further view of Maeda, US 2001/0048770 A1. Applicants respectfully traverse these rejections for the reasons stated below.

With regard to the 35 USC 112, second paragraph rejection to claims 6, 12 and 18, Applicants submit that the designation MPEG-4 refers to the Internationally adopted MPEG-4 standard, ISO/IEC designation ISO/IEC 14496, as adopted in 1999. With regard to the 35 USC 112, second paragraph rejection to claims 19 and 20, Applicants have amended the claims to provide proper antecedent basis.

With regard to the 35 USC 102(b) rejection to claims 1, 2, 6-8, 12-14, 18 and 20, Applicants respectfully traverse this rejection because Kim fails to disclose each and every feature of the claims as required by 35 U.S.C. 102(b). For instance, claim 1 recites "a foreground encoding system for coding a foreground shape in a *foreground video object plane* ... and a background encoding system for coding [a] *background video*

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*object plane.*” Independent claims 7 and 13 include similar features. Accordingly, Applicants provide a system that separately encodes at least two video object planes, i.e., foreground and background. Conversely, Kim teaches a system that operates on only a single plane. This is plainly evident in column 4, lines 9-13 of Kim, “[f]irst, an image signal, e.g., a digital image frame signal or a **video object plane** in a digital frame signal is inputted.” The signal (e.g., the video object plane) includes an object and background pixels “located outside the object.” Kim then goes on to described a system for processing the video object plane. The system of Kim does not provide separate encoders for encoding both a foreground and a background video object plan.

This distinction is further evidenced in Figure 2 of Kim in which the image signal is only inputted into **only** the second encoding channel 500. The first encoding channel 300 only receives the mask data, which is comprised of binary ones and zeros to distinguish between the object and the background, and converts the mask data to a contour signal. The mask data of Kim is **not** a video object plane, and at best may consist of a portion of the data that might be contained in the same video object plane inputted to the second encoding channel. Accordingly, because Kim fails to teach a foreground encoding system for coding a foreground shape in a *foreground video object plane* and a background encoding system for coding a *background video object plane*, Applicants respectfully submit that claims 1, 7 and 13 are not anticipated by Kim.

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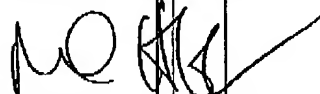
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The deficiencies noted above are not overcome by the secondary references cited with regard to the outstanding 35 USC 103(a) rejections. Accordingly, the remaining claims are believed allowable for the same reasons cited above, as well as for their own additional features not taught by the prior art. Because of this, Applicants respectfully request withdrawal of all rejections.

In view of the foregoing, Applicants respectfully request that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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